

Exhibit RRRR.

STANLEY

LAW GROUP

Stanley Law Group has offices in Texas and California and represents clients in complex class action, personal injury, pharmaceutical, commercial and insurance litigation. The firm's members have wide-ranging courtroom experience representing clients in class action, derivative and environmental tort litigation, including numerous cases on behalf of individuals suffering from injuries due to harmful products.

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WHAT WE DO

CLASS ACTION

The firm has successfully served as Class Counsel in the following cases:

- Settlement of a nationwide class action against American Airlines under ERISA related to pension benefits of its former AirCal pilots.
- Settlement of a nationwide class action against Wells Fargo Bank for violations of RESPA.
- Settlement of statewide class action against State Farm Insurance Cos., Allstate Insurance Cos., Farmers Insurance Cos. And GEICO Insurance Cos. for violations of the Texas Insurance Code relating to claims procedures for automobile policyholders.
- Settlement (along with multiple co-counsels) of major nationwide class action litigation involving General Motors pickup trucks.
- Settlement following summary judgment of a statewide class action for breach of contract and deceptive trade practices against Southwestern Bell Mobile Systems.
- Settlement of a nationwide securities class action on behalf of shareholders of Monarch Dental Associates (while serving as Liaison Counsel) for violations of §§10(b) and 20(a) of the Securities Exchange Act of 1934 and SEC Rule 10b-5.
- Settlement of a nationwide securities class action on behalf of shareholders of STB Systems, Inc. (while serving as Liaison Counsel) for violations of the Texas Securities Act and the Securities Act of 1933 arising out of the defendants' misrepresentations and omissions concerning the company's operations and future prospects.
- Settlement (along with other class counsel) of a nationwide class action on behalf of holders of both preferred and common shares of Walden Properties, Inc. and its directors arising out of Walden's efforts to complete a merger with Olympus Real Estate Corporation on grossly inadequate terms. The settlement resulted in a substantial increase in the value received by shareholders at the conclusion of the merger.
- Settlement of a nationwide securities class action on behalf of shareholders of Dynamex, Inc. (while serving as Liaison Counsel) for violations of §§10(b) and 20(a) of the Securities Exchange Act of 1934 and SEC Rule 10b-5.
- Settlement of a class action on behalf of customers of Southwestern Bell Telephone Company for violations of the Texas Finance Code.

- Settlement of a class action on behalf of persons who entered into lease agreements with UDR Western Residential, Inc., and other of its affiliates, arising out of claims under the Texas Water Code, regulations of the Texas Natural Resources Conservation Commission, the Texas Utility Code, regulations of the Public Utility Commission and the Texas Debt Collection Practices Act.
- Settlement of a nationwide class action on behalf of customers of Ticketmaster Group, Inc., and certain of its affiliates, who purchased tickets with a credit card and were charged an illegal surcharge in violation of the Texas Finance Code.
- Settlement of a nationwide class action against FirstUSA Bank for violations of the Truth in Lending Act.
- Settlement of a nationwide securities class action on behalf of shareholders of drkoop.com, Inc. (while serving as Liaison Counsel) for violations of §§10(b) and 20(a) of the Securities Exchange Act of 1934 and SEC Rule 10b-5.
- Settlement of a nationwide securities class action on behalf of shareholders of UICI Corporation (while serving as Liaison Counsel) for violations of §§10(b) and 20(a) of the Securities Exchange Act of 1934 and SEC Rule 10b-5.
- Settlement of derivative litigation on behalf of Dollar General Corporation filed against directors of the corporation for breach of the board's fiduciary duties to the corporation and its shareholders. [The case resulted in the largest settlement in Tennessee history.]
- Settlement of a nationwide securities class action on behalf of shareholders of i2 Technologies Corporation (while serving as Liaison Counsel) for violations of §§10(b) and 20(a) of the Securities Exchange Act of 1934 and SEC Rule 10b-5.
- Settlement of a nationwide class action against Sears Roebuck & Co. that represents a landmark and virtually unprecedented settlement of a consumer class action case. Under the settlement, Sears will install free of charge for a class of almost four million customers anti-tip brackets to prevent tipping accidents of its free-standing electric and gas ranges that frequently cause severe burns, crushing and death. Those customers who already paid to have anti-tip brackets installed will receive reimbursement. Furthermore, Sears will install anti-tip brackets on all sales of new ranges for at least three years, and it is Plaintiffs' expectation that it will become a permanent practice of Sears. By, in effect, obtaining a recall, this settlement actually obtained better relief than likely could have been obtained through trial and accomplished what the Consumer Product Safety Commission refused to do for over twenty years.

- Settlement of derivative litigation on behalf of shareholders of Patterson-UTI Energy, Inc., filed against officers and directors of the company resulting from the self-dealing and fraudulent embezzlement of company funds by its former chief financial officer.
- Settlement of derivative litigation on behalf of a class of shareholders against 7-Eleven, Inc., for the company's breach of fiduciary duties, good faith and due care in connection with an inadequate tender offer.
- Settlement of derivative litigation against TXU Corp. arising under Section 14(a) of the Securities Exchange Act of 1934, and rules promulgated thereunder, in connection with the solicitation of proxies in favor of a proposed management-led leveraged buyout.
- Settlement of a class action against Edward D. Jones & Co. for breach of fiduciary duty and other state law claims arising from its retention of illicit profits from payments made to it by mutual fund families, which payments were predicated on the state court class members' holding mutual fund shares in their Edward Jones accounts.
- Settlement, following four hard-fought years of litigation, of a nationwide class action against Sprint related to its business customers' payment of Universal Service Fund charges.
- Settlement of derivative litigation on behalf of shareholders of Dean Foods Company filed against the officers and directors of the company resulting from improperly backdating dozens of grants of Dean Foods stock options to its executives, improperly recording and accounting for such back dated stock options, and producing false financial statements and other false SEC filings to Dean Foods' shareholders that improperly recorded, accounted for and concealed the back dated option grants.
- Settlement of derivative class action litigation filed against Dave & Buster's, Inc., and certain of its officers and directors, seeking to enjoin an inadequately-priced merger agreement.

In addition, the firm has successfully prosecuted and settled numerous individual actions, including:

- Obtained a multi-million dollar jury verdict against Texas's largest independent commercial real estate services company and one of its agents for fraud and making negligent misrepresentations to nine real estate partnerships controlled by a California real estate company.
- A multi-million dollar settlement, over five times in excess of the policy limits, with The Medical Protective Company following a jury verdict in favor of the firm's plaintiff in a medical malpractice coverage dispute.

- Settlement of business tort litigation on behalf of the former owner of a major league sports franchise against a national bank relating to the sale of the franchise.
- Settlement of tortious interference with business contract litigation on behalf of a large independent electrical supplier/contractor.
- Settlement (during continuance of the trial) of allegations of fraudulent inducement resulting from the sale of a group of weight loss centers to an investment bank.

**OTHER
LITIGATION**

The firm's attorneys also have extensive experience in the representation of individuals and companies in business tort litigation, insurance coverage litigation, insurance bad faith litigation and construction litigation. On the other side of the docket, the firms' attorneys have successfully defended many cases, including obtaining a zero dollar jury verdict in a case where the plaintiff sought \$375,000,000.00 in damages and the trial of the case took a month.

WHO WE ARE

MARC R. STANLEY

Board Certified, Civil Trial Law, Texas Board of Legal Specialization

Admitted to bar, 1982, Texas; District of Columbia, 2012; also admitted to practice before U.S. Supreme Court; U.S. Court of Appeals, Fifth, Eighth and Ninth Circuits; U.S. District Courts, Northern, Southern, Eastern and Western Districts of Texas and the Western District of Arkansas.

Education and Honors: George Washington University (B.B.A., 1979); legal education, University of Texas (J.D., 1982). Board Certified, Civil Trial Law, Texas Board of Legal Specialization, 1992. President, University of Texas, Student Bar Association, 1981-82.

Recent Authorship & Speeches: "Dealing with Attorneys' Fees and Objections in Class Actions," National Class Action Institute, American Bar Association, Chicago, Illinois (1997); (Speaker) "Class Action Update," Advanced Products Liability Conference, Texas Trial Lawyers Association (1998); (Speaker) "Advanced Commercial and Consumer Law Course," State Bar of Texas (1999); (Speaker) "National Class Action Seminar," New Orleans, Louisiana (2001); (Speaker) "Class Action Update," Advanced Personal Injury Seminar, State Bar of Texas, Dallas and Houston, Texas (2002); (Speaker) "Ethics of Mass Tort Settlements: How a Lawyer with No Clients Can Settle Your Cases Without Your Consent," (July 2002); (Speaker) "Class Actions, MDL, Venue, and Forum Non: Micro Management of Mass Torts," Texas Trial Lawyers Association (December 2003); (Speaker) "A Brave New World: Texas Class Action Practice After HB4," State Bar of Texas (January 2004). (Co-author/Speaker) "The Class Action Unfairness Act of 2005;" Dallas Bar Headnotes (April 2005); (Speaker) "Changing the Rules: Texas Class Action Practice After HB4 and CAFA;" State Bar of Texas (August 2006).

Member: Chairman, Texas Public Finance Authority, 1991-95; Member, 1995-97. Dallas and American Bar Associations; State Bar of Texas; Dallas Trial Lawyers Association (President, 2003); Texas Trial Lawyers Association (Board of Directors, 1999-; Chairman, Class Action Task Force, 2000; Secretary-Treasurer, 2002; President, 2006); American Association for Justice (Board of Governors, 2001-2004); Public Justice; American Board of Trial Advocates; National Association of Consumer Advocates; Dallas Bar Foundation.

MARTIN WOODWARD

Admitted to bar, 1996, Texas; also admitted to practice before U.S. Court of Appeals Fifth, Sixth, Eighth, Ninth and Eleventh Circuits; U.S. District Court, Northern, Eastern, Southern and Western Districts of Texas.

Education and Honors: Swarthmore College (B.A., 1990); University of Texas (J.D., 1996). Secretary, Corporate Counsel Society, University of Texas School of Law. 1994-95. Executive Editor, Texas International Law Journal, 1995-96; Baker & Botts Best Note Award, 1995; E. Ernest Goldstein Best Editor Award, 1996.

Internship: Judicial Intern to Hon. Rose Spector, Justice, Supreme Court of Texas, Spring, 1996.

Member: Dallas, Frisco and American Bar Associations; American Association for Justice; Texas Trial Lawyers Association; Dallas Trial Lawyers Association; State Bar of Texas; College of the State Bar of Texas; Public Justice; National Association of Consumer Advocates.

Recent Authorship and Speeches: (Author) "TRIPS and NAFTA's Chapter 17: How Will Trade-Related Multilateral Agreements Affect International Copyright?" 31 Tex. Int'l L.J. 269 (1996); (Co-Author) "Resolving Class Actions in the Plaintiff's Favor: Settlement and Contested Final Judgments," Federal Bar Association, April 2001; (Co-Author) "Summaries of Significant Class Action Opinions in Texas State and Federal Courts: 2001-2002," May 2002; (Co-Author) "Class Actions, MDL, Venue, and Forum Non: Micro-Management of Mass Torts," Texas Trial Lawyers Association, December 2003; (Co-Author) "A Brave New World: Texas Class Action Practice After HB4," State Bar of Texas, January 2004; (Co-Author) "Changing the Rules: Texas Class Action Practice After HB4 and CAFA," State Bar of Texas, August 2006; (Speaker) "Class Action Basics in Texas," Frisco Bar Association, October 2006; (Co-Author) "Navigating the Rough Terrain: Class Actions in Texas after HB4 and CAFA," The Advocate, Fall 2008; (Speaker) Class Action Symposium, Consumer Rights Conference, October 2008.

**MATTHEW J.
ZEVIN**

Admitted to bar, 1994, California; 1997, Washington (inactive); (not admitted in Texas); also admitted to practice before U.S. Court of Appeals, Sixth, Ninth and Tenth Circuits; U.S. District Courts, Northern, Southern, Eastern and Central Districts of California and Western District of Michigan.

Education and Honors: California State University, Northridge (B.S., 1990); University of Richmond (J.D., with honors, 1993). McNeill Law Society. Recipient, Lawyers Co-Operative Publishing Company Book Award (highest grade), Mergers and Acquisitions.

Diploma: Trial Advocacy Skills, National Institute of Trial Advocacy.

Member: State Bar of California; American Bar Association; American Association for Justice; Public Justice; Consumer Attorneys of California. (Resident, California Office).

**SCOTT A.
KITNER**

Admitted to bar, 2008, Texas; also admitted to practice before the United States District Court for the Northern District of Texas.

Education and Honors: Preparatory education, Emory University (B.A., *with High Honors*, 2005), Phi Beta Kappa; legal education, The University of Texas School of Law (J.D. *with Honors*, 2008).

Clerkship: Judicial clerk to the Honorable David M. Medina, Justice, Texas Supreme Court (2008-2009).

Internship: Intern to the Honorable Barbara M. G. Lynn, Judge, United States District Court for the Northern District of Texas. (Summer 2006).

Recent Authorship: "The Need and Means to Restrict Spectators from Wearing Buttons at Criminal Trials." 27 Rev. Litg. 733 (2008).

Member: Dallas and American Bar Associations; Texas Trial Lawyers Association.

Pro Bono: Legal Aid of Northwest Texas; Housing Crisis Center

Exhibit SSSS.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SHANE GALITSKI, RICHARD
TALIAFERRO and BRIAN NEWBOLD,
Individually and on behalf of All Others
Similarly Situated,

Plaintiffs,

v.

SAMSUNG TELECOMMUNICATIONS
AMERICA, LLC,

Defendant.

CASE NO. 3:12-CV-4782-D

**DECLARATION OF JAMES R. HAIL IN SUPPORT OF PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION**

I, James R. Hail, declare as follows:

1. I am a partner with the law firm of Doyle Lowther LLP, attorneys of record for plaintiffs. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiffs' Motion for Class Certification.

3. Plaintiffs' Counsel are willing and able to commit the time and resources necessary to litigate this case to a final resolution. As part of this litigation's class certification phase, Plaintiffs' Counsel have expended substantial time and resources in reviewing hundreds of thousands of pages of discovery, propounding and answering discovery, deposing witnesses, and retaining expert assistance. Plaintiffs' Counsel have reviewed documents produced by defendant Samsung Telecommunications America, LLC ("Samsung"), and non-parties, [REDACTED]

[REDACTED] AT&T Mobility LLC (“AT&T”), Verizon Wireless (“Verizon”), Sprint Spectrum L.P. (“Sprint”), T-Mobile U.S.A., Inc. (“T-Mobile”), [REDACTED]

4. Plaintiffs’ Counsel spent hundreds of hours reviewing over 800,000 pages of documents produced to date, which includes native Excel files containing large quantities of data. To review this substantial document production, Plaintiffs’ Counsel retained expert assistance to create and manage a searchable document database.

5. Plaintiffs’ Counsel took the depositions of four key witnesses, including executives from Samsung and AT&T in their individual and corporate capacities. We also deposed an engineer from [REDACTED]. Because this deponent was located in Korea, his deposition required obtaining the agreement of all parties to participate in a telephonic deposition from Korea, and the hiring of a translator, a time consuming and expensive process.

6. Plaintiffs’ Counsel prepared and defended the depositions of the three named plaintiffs and assisted plaintiffs in responding to forty-seven requests for production of documents, twenty-five interrogatories, and twenty requests for admissions served by Samsung.

7. Plaintiffs’ Counsel traveled to Plano, Texas to observe three days of forensic examination and testing of plaintiffs’ phones. As part of this process, plaintiffs’ counsel hired a third party to mirror image the phones to preserve electronic evidence.

8. Plaintiffs’ Counsel retained W. Ross Stone, an expert with more than 45 years experience in cellular and wireless communications to prepare an expert report. Samsung has already indicated its intent to depose Mr. Stone.

9. Included in this appendix filed in support of plaintiffs’ motion for class certification are true and correct copies of the following:

- Firm Resume for Doyle Lowther LLP
- Firm Resume for Stanley Law Group
- Excerpts from the Deposition Transcript of Shane Galitski
- Declaration of Shane Galitski
- Excerpts from the Deposition Transcript of Brian Newbold
- Declaration of Brian Newbold
- Excerpts from the Deposition Transcript of Richard Taliaferro
- Declaration of Richard Taliaferro
- Excerpts from the Deposition Transcript of Tim Sheppard
- Excerpts from the Deposition Transcript of Steven Cistulli
- Excerpts from the Deposition Transcript of George P. Hewlett, Jr.
- Report of W. Ross Stone
- 2010 Census Reporting
- Bates numbered documents produced by defendant Samsung Telecommunications America, LLC
- Bates numbered documents produced by third party [REDACTED]
[REDACTED]
- Bates numbered documents produced by third party T-Mobile USA, Inc.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 24th day of September 2014 at San Diego, California.

/s/ James R. Hail
James R. Hail

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all counsel of record in accordance with the FEDERAL RULES OF CIVIL PROCEDURE on September 24, 2014:

/s/ James R. Hail

James R. Hail